

United States Environmental Protection Agency Region 4

Air Enforcement and Toxics Branch

Inspection Report

I. GENERAL INFORMATION

Facility Name: Williams Field Services, Mobile Bay Gas Processing Facility

Location (Address): 6000 Rock Road, Coden, Alabama, 36523

Inspection Date: April 17-19, 2018

Type of Inspection: Partial Compliance Evaluation (LDAR and Infrared Camera)

ICIS-Air Number: AL0000000109708056

EPA Investigator(s)/Inspector(s): Region 4 - Denis Kler (Lead), and Jake Carpenter
Region 3 – Bruce Augustine
Region 5 – Constantinos Loukeris

State/Local Inspector(s): Harlotte Bolden-Wright

Person(s) Contacted at Facility (Name/Title): Marc Ramos, Operations Supervisor

Report Prepared by: Denis Kler

II. FACILITY INFORMATION

A. Facility and Permit Information

Facility and Permit Information	Comments
1. Type of facility (e.g., chemical plant, refinery, cement manufacturer, etc.).	On-shore natural gas processing
2. Air permit number(s) and type of permit (e.g., Title V, PSD, Synthetic Minor, etc.).	Operating Permit 503-8056
3. Air permit issuance date.	October 5, 2017
4. Air permit expiration date.	October 4, 2022

5. Facility classification (Major, Synthetic Minor/Conditional Major, Minor).	Major
6. Major source pollutants (if applicable).	Volatile Organic Compounds
7. Applicable regulations (e.g., State Implementation Plan, MACT Subpart FFFF, NSPS Subpart EEEE, etc.).	40 CFR Part 60 Subpart KKK 40 CFR Part 60 Subpart VV
8. Types of air emission points (e.g., tanks, process vents, boilers, etc.).	LDAR components
9. Types of air pollution control equipment (e.g., baghouse, scrubber, afterburner, etc.).	Flare Thermal Oxidizer

B. Process Description (provide narrative or attach description provided by the company or excerpts from the permit)

Williams operates a natural gas processing facility located in Coden, Alabama. The facility operates two process trains to process about 690 million standard cubic feet per day of natural gas, about 30,000 barrels per day of natural gas liquids, and some amount of natural gasoline is produced as a byproduct. The facility receives gas from both onshore and offshore sources. The raw gas passes through slug catchers to remove the liquid hydrocarbon (condensate) and water. The condensate is sent to the condensate stabilizer area, and the water is directed to a closed drain system. The gas stream exiting the slug catchers is sent to the dehydration unit. After leaving the dehydration unit the gas is cooled to condense out the natural gas liquids. The gas is recompressed and sent to the sales pipeline. The natural gas liquids are sent to an amine contactor to remove the carbon dioxide and sulfur compounds, then sent to the amine treating system and then to the sales pipeline. The amine solution is sent to the amine regeneration tower where the impurities are removed from the amine solution. The amine is recycled to the amine contactor and the gases from the regeneration tower are sent to a thermal oxidizer.

III. INSPECTION ACTIVITIES

Activity	Yes No NA	Comment
Opening Meeting		
1. Date and time entered the facility.		April 17, 2018, about 9:05 am (central)
2. Credentials presented to facility personnel (include name and title)	Yes	Presented credentials during the opening meeting.
3. Conducted an opening meeting to explain the purpose and objectives of the inspection.	Yes	Opening meeting conducted at main office prior to on-site evaluation.

4. Discussed safety issues.	Yes	Site safety information was provided.
5. Discussed which records to be reviewed.	Yes	Discussed records the inspection team would like to review.
6. Discussed the facility walk-through and the areas to be observed in the facility.	Yes	
7. Discussed facility policy regarding photographs or video (if applicable).	Yes	
8. Discussed the use of the infrared camera, TVA, PID, and any other equipment.	Yes	Infrared camera, toxic vapor analyzers, and personal multi-gas monitors.
9. Discussed CBI.	Yes	Informed Mr. Ramos that the company can claim information as CBI, but he must clearly identify the information that is to be held as CBI.
Records Reviewed at the Facility		
10. The types of records reviewed and the time period reviewed.	Yes	LDAR records for various months within the last 2 years.
Facility Walk-Through Observations		
<p>11. The process equipment observed and the associated operational rate observed (e.g., Furnace 1 production rate was 5 lbs/hr on 1/1/15, at 2:00 pm – permit requires max rate at 6 lbs/hr).</p> <p>Provide the date and time the information was recorded by the inspector.</p> <p>Identify the permit limit (if applicable).</p> <p>An attachment may be used for a large amount of information.</p>	Yes	<p>LDAR monitoring in the following areas:</p> <ul style="list-style-type: none"> On-shore inlet Off-shore inlet Slug catcher Stabilizer area Condensate storage tank Regeneration scrubber Natural gas liquid dehydration Natural gas liquid purification Train #1 Train #2 <p>Company began modifying process equipment and installing equipment in late 2017 to accommodate a new gas stream that contains a higher natural gas liquids content. The processes changes are targeted for completion in late 2018.</p> <p>On April 18 and 19, 2018, the EPA had conference calls with the Williams' corporate environmental staff (Brandon Clayton, Phil Roberts, Joe McCay and Rafael Castillo) to</p>

		discuss process changes and regulation applicability. A company representative indicated that the company has interpreted the NSPS OOOOa regulations as taking effect once the entire project is completed and in service, until then the company will comply with NSPS KKK for any new equipment installed and/or modified existing equipment.
<p>12. The type of process parametric monitoring observed and the associated value observed (e.g., Furnace 1 flux injection rate was 200 lbs/batch at 1/1/15, at 2:00 pm – permit requires max rate at 225 lbs/batch).</p> <p>Provide the date and time the information was recorded by the inspector.</p> <p>Identify the permit limit (if applicable).</p> <p>An attachment may be used for a large amount of information.</p>	No	
13. If process equipment or parametric monitoring equipment was not operating, state the reason by facility personnel why the equipment was not operating.	No	
<p>14. The type of air pollution control equipment, the process equipment it is controlling, and the associated parametric monitoring value observed (e.g., baghouse pressure drop, temperature, scrubber flow rate, etc.).</p> <p>(For example - RTO 1 controlling furnace 1, 1,500 degrees F on 1/1/15, at 2:00 pm – permit requires 1,400 degrees F or higher).</p>	Yes	<p>Flare viewed with infrared camera only, and no video or image was taken.</p> <p>Thermal oxidizer viewed with infrared camera only, and no video or image was taken.</p>

<p>Provide the date and time the information was recorded by the inspector.</p> <p>Identify the permit limit (if applicable).</p> <p>An attachment may be used for a large amount of information.</p>		
<p>15. Continuous emissions monitoring devices and values observed. (e.g., CEMS, COMs, etc.).</p> <p>Provide the date and time the information was recorded by the inspector.</p> <p>Identify the permit limit (if applicable).</p> <p>An attachment may be used for a large amount of information.</p>	NA	
<p>16. If air pollution control equipment was not operating, state the reason by facility personnel why the equipment was not operating.</p>	NA	
<p>17. Capture and collection system (enclosures and hoods) observations, if applicable (e.g., the magnitude and duration of emission escaping capture from the hood).</p>	NA	
<p>18. Ductwork transferring the emissions to the air pollution control device observations, if applicable (e.g., the magnitude and duration of emission escaping from the ductwork, holes or deterioration in ductwork, no deterioration observed, etc.).</p>	NA	
<p>19. Any existing unpermitted emission points, new unpermitted emission points, or non-permitted construction activities observed. (if yes, describe in the comments field).</p>	NA	

20. Were any visible emissions observed? (if yes, identify the location and equipment).	NA	
21. Was a Method 9 reading performed? (if yes, identify the location and equipment).	NA	
22. Was the cause of the visible emissions investigated and the information documented?	NA	
23. Was a Method 22 performed for visible emissions? (if yes, identify the location and equipment).	NA	
24. Identify the cause of the visible emissions as explained by facility personnel, if applicable.	NA	
25. Was the infrared camera used? If so, attach the video log (which includes the equipment ID, and the date and time the video was recorded) and videos to this report.	Yes	See attached video log.
26. Was the TVA used? If so, identify the equipment monitored and the results. Provide the date and time the information was recorded by the inspector. Include actual instrument readings for each piece of equipment monitored above the leak definition and/or where the infrared camera identified a release. An attachment may be used for a large amount of information.	Yes	See attached LDAR monitoring summary table. Some components have tags and other components in the area do not have tags. Encos, the LDAR contractor, was on-site conducting semi-annual monitoring. Encos provided Mr. Loukeris an electronic copy of the LDAR database.
27. Was the PID used? If so, identify how the PID was used and the results. Provide the date and time the information was recorded by the inspector. An attachment may be used for a large amount of information.	No	

Closing Meeting		
28. Conducted a closing meeting.	Yes	
29. Summarize any additional information needed, if applicable?	Yes	Flare design information. Williams verbally agreed to provide information that was discussed with the EPA, but Williams requested that the EPA provide an email pertaining to the topics. The EPA will send an email to Williams for information pertaining to NSPS applicability determinations, and the time line and cost of the current condensate project.
30. Accept a declaration of CBI, if applicable?	No	Asked Mr. Ramos if he wanted to claim any information as CBI, and he stated that he did not have any CBI claims on records taken from facility.
31. Discussed observations.	Yes	Discussed LDAR program concerns with Mr. Ramos. Specifically, tagging of components, leak rate calculations, gas chromatograph components not tagged, propane refrigeration, flare closed vent system, and late monitoring on newly installed equipment.
32. Discussed next steps, if applicable?	No	
33. Date and time inspection concluded.		April 19, 2018, at 4:50 pm.
Miscellaneous		
34. Include any additional observations, if applicable.	NA	On April 19, 2018, at approximately 11:00 am the plant emergency horn sounded and we were asked to evacuate the plant. The EPA team was informed that this was a plant-wide evacuation drill.

EPA Investigator/Inspector Signature: _____

Date Report Finalized: _____